

1 James R. Condo (#005867)
2 Kristine L. Gallardo (#033975)
3 SNELL & WILMER L.L.P.
4 One Arizona Center
5 400 E. Van Buren, Suite 1900
Phoenix, AZ 85004-2204
Telephone: (602) 382-6000
jcondo@swlaw.com
kgallardo@swlaw.com

6 Richard B. North, Jr. (admitted *pro hac vice*)
7 Georgia Bar No. 545599
Matthew B. Lerner (admitted *pro hac vice*)
8 Georgia Bar No. 446986
NELSON MULLINS RILEY & SCARBOROUGH LLP
9 Atlantic Station
201 17th Street, NW, Suite 1700
Atlanta, GA 30363
Telephone: (404) 322-6000
richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com

10 *Attorneys for Defendants*
11 *C. R. Bard, Inc. and*
12 *Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability Litigation

No. 2:15-MD-02641-DGC

**THE PARTIES' NOTICE OF
FILING SUBMISSION REGARDING
MATURE CASES**

(Assigned to the Honorable David G. Campbell)

Pursuant to the Court's Order dated July 9, 2018 (Doc. 11774), the Plaintiffs and the Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. submit the attached summary for the Court's consideration regarding the mature cases.

The following materials are attached:

Exhibit "A" – A list of pertinent orders to be attached to the summary provided to the transferor courts;

1 Exhibit "B" – A compilation of the remaining discovery and activities to be
2 completed in the mature cases (which has been agreed upon by the parties);

3 Exhibit "C" – A proposed summary of the MDL proposed by the Defendants; and

4 Exhibit "D" – A red line version of Exhibit "C" reflecting the Plaintiffs' objections
5 and proposed edits to that summary.

6 The parties stand ready to address any questions the Court may have.

7
8 RESPECTFULLY SUBMITTED this 13th day of August, 2018.

9 GALLAGHER & KENNEDY, P.A.

10 NELSON MULLINS RILEY &
11 SCARBOROUGH LLP

12 By: s

13 Mark S. O'Connor (011029)
14 Paul L. Stoller (016773)
15 2575 East Camelback Road
16 Phoenix, Arizona 85016-9225

17 Ramon Rossi Lopez
18 (admitted *pro hac vice*)
19 CA Bar No. 86361
20 LOPEZ McHUGH LLP
21 100 Bayview Circle, Suite 5600
22 Newport Beach, California 92660
23 Attorneys for Plaintiffs

24 By: /s/ Richard B. North, Jr.
25 Richard B. North, Jr. (admitted *pro hac vice*)
26 Georgia Bar No. 545599
27 Matthew B. Lerner (admitted *pro hac vice*)
28 Georgia Bar No. 446986
29 Nelson Mullins Riley & Scarborough LLP
30 201 17th Street, NW / Suite 1700
31 Atlanta, GA 30363

32 James R. Condo (005867)
33 Amanda C. Sheridan (027360)
34 One Arizona Center
35 400 E. Van Buren, Suite 1900
36 Phoenix, Arizona 85004-2202

37 Attorneys for C. R. Bard, Inc. and Bard
38 Peripheral Vascular, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of August 2018, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Richard B. North, Jr.
Richard B. North, Jr.